

# ROMANO

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May 16, 2024

**APPLICATION GRANTED  
SO ORDERED**

**By ECF**

Hon. John G. Koeltl, U.S.D.J.  
United States District Court  
for the Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Courtroom 14A  
New York, New York 10007

5/17/24   
John G. Koeltl, U.S.D.J.

Re: ***Jane Doe v. Russell Wendell Simmons, Docket No. 24-cv-01043-JGK***  
***Letter Motion regarding Filing Declarations and Exhibits Under Seal***

Dear Judge Koeltl,

We represent the defendant, Russell Wendell Simmons ("Simmons"), in the above-referenced action. We write pursuant to 6.A.2 of Your Honor's Individual Practices and Rules to request permission to file the Declarations of Russell Simmons, Joseph Hadacek, and Lawrence Cohen (collectively, the "Declarations"), and all attached Exhibits (collectively, the "Exhibits"), under seal. With your approval, these Declarations and Exhibits will be attached (filed under seal) to our response tomorrow.

We are requesting to file the Declarations and Exhibits under seal because the Plaintiff in this case has been granted permission by this Court to proceed anonymously, and the Declarations identify the Plaintiff by her name. The Exhibits are agreements between Simmons and the Plaintiff, in which the Plaintiff's name is visible. To protect the Plaintiff's anonymity, we respectfully request that Your Honor grant us permission to file the Declarations and Exhibits under seal and un-redacted.

We met and conferred with the Plaintiff's counsel prior to the teleconference on April 16, 2024, and they had no objection to our filing under seal of any documents that identified the Plaintiff by her name.

Respectfully submitted,

/s/ David M. Fish

David M. Fish